Code of Conduct ລາSIBS

This is SIBS GROUP

VISION

We strive to be the most efficient developer, manufacturer, and owner of homes in the Nordic region. SIBS' goal is to change the industry by optimizing all aspects of building design, production, construction, and property management while maintaining a focus on sustainability and design flexibility. It is time to go beyond traditional construction to an era of more industrial intelligence and change the way we design, construct, deliver and manage residential buildings.

OUR BUSINESS

Within SIBS Group, there are five companies that cover the entire value chain from acquisitions to property management. Expertise and continuous development remain within the Group and contribute to quality-assured and developing operations. Our proprietary modular design and construction system allows greater flexibility and significantly shorter construction times. Our residential buildings are managed long-term within the Group.

OUR OFFER

With the tenants in focus, we develop surface-efficient and sustainable rental apartments in the affordable premium segment. Our homes contribute to the creation of the good society and are designed with a focus on sustainability, quality, functionality, and design. They appeal to a broad target group with different backgrounds in different stages of life.

OUR STRATEGIC PRIORITIES

Sustainability

Our housing projects must last for generations, therefore sustainability is clearly integrated in every step. The goal is to constantly improve the construction process to minimize the impact on the environment and contribute to increased social sustainability.

Market insight

With well-grounded analyses and an understanding of the market's development, we choose our geographical locations and development areas. Analysis and acquisitions made early in our value chain determine how large values that are created later.

Project portfolio

Our project portfolio is well-balanced for growth. We ensure that we take advantage of opportunities at both macro and micro level. Geographical focus is on Mälardalen and the surrounding area as well as large cities such as Malmö and Gothenburg. We are also interested to establish in larger regional cities with universities.

The tenant today and tomorrow

With dep knowledge of trends and driving forces in housing development, we stay at the forefront. With the tenant in focus, we are already acting on tomorrow's needs.

Technique

With new technology, we create as energy-efficient buildings as possible while our methods provide major time and cost savings. Our solutions will make it easier for our tenants to live sustainably.

Architecture

Our houses will contribute to an attractive cityscape, which is why architecture is a high priority both externally and internally. Our in-house developed modular design and construction system provides great flexibility to create a premium feeling in every home.

Functionality

SIBS homes are designed to serve the needs of everyday life as well as for the special occasions. The function is in focus which makes it a little better, a little smoother and a little more comfortable to live and work in our houses.

Scope and background

This code of conduct covers the board, management, and all employees at SIBS AB, including subsidiaries and group companies.

Our suppliers are covered by our supplier code.

The Code of Conduct clarifies our core values and is based on the ten principles of the UN Global Compact on human rights, labour, the environment, and anti-corruption.

PRINCIPELES IN UN GLOBAL COMPACT:

Human Rights

<u>Principle 1:</u> Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

<u>Principle 3:</u> Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

<u>Principle 7:</u> Businesses should support a precautionary approach to environmental challenges; <u>Principle 8:</u> undertake initiatives to promote greater environmental responsibility; and <u>Principle 9:</u> encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Working conditions and human rights

We work for freedom of association and the right to organize in a union by informing employees at our factory about their rights.

We do not accept any form of discrimination. This means that everyone should have the same opportunities regardless of gender, origin, age, disability, religion, and political opinion.

A physically safe and mentally healthy workplace is our highest priority. This is achieved through our structured work with the work environment.

We do not accept any form of physical or mental punishment or threats of this. Everyone who performs work for us must be at least 15 years old.

Environment

We always follow the precautionary principle by analysing decisions that can have a major environmental impact. We work actively to reduce our environmental impact, among other things by working with environmental certification and reducing the climate impact throughout the chain from raw materials to property management.

Business ethics

We do not accept any forms of corruption. We completely refrain from giving or receiving any kind of gifts that could put us or the other party in any form of dependency. We avoid conflicts of interest by not conducting private business with related parties or where we have interests. All use of our subcontractors or supplier contacts for private use must be approved by the CEO.

Information management

We take measures so that confidential information only comes to those who are entitled to it. If we accidentally gain access to confidential information, we will refrain from using it and report the error.

We protect all personal data and save only personal information that can be linked to a person where the need exists in accordance with the GDPR.

Compliance

This Code of Conduct is continuously followed up as a natural part of our business. The management of each company within the group is responsible by setting a good example and supporting the employees.

If an employee does not follow this code of conduct, it leads to corrective action.

If a supplier does not follow our supplier code on several occasions or seriously violates it, the business collaboration will be terminated.

SIBS encourages everyone covered by this code to report all types of misconduct to their immediate superior. Through a whistleblower function, this can be done completely anonymously. An independent lawyer analyses all reported cases and does not provide any information to SIBS that may affect the anonymity of the person who reported it. The whistleblower function can be accessed on our website www.sibs.se.

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Erik Thomaeus CEO